



THE CITY OF NEW YORK  
**LAW DEPARTMENT**  
100 CHURCH STREET  
NEW YORK, NY 10007

MURIEL GOODE-TRUFANT  
*Corporation Counsel*

JOHN SCHEMITSCH  
Senior Counsel  
jschemit@law.nyc.gov  
Phone: (212) 356-3539  
Fax: (212) 356-3509

January 7, 2025

**VIA ECF**

Honorable Ronnie Abrams  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, NY 10007

Re: Elsun Wheeler, et al. v. City of New York, et. al., 24-CV-469 (RA)

Your Honor:

I am a Senior Counsel in the Office of the Muriel Goode-Trufant, Corporation Counsel of the City of New York, and attorney for defendant City of New York in the above-referenced matter. Defendant writes in response to the Court's December 19, 2024 and December 27, 2024 orders, directing defendant to file a letter advising the Court "(1) why they have been unable to identify the three officers whose identities are sought by Plaintiff; and (2) when they expect to be able to provide that information to Plaintiff." ECF Nos. 42 and 44. The undersigned apologizes for the delay in providing this information. While the video footage identified officers who had numbers on their vests, these numbers did not directly correspond to their individual shield numbers, prompting my office to coordinate with the Department of Correction to visually identify the John Doe officers. As of the filing of this letter, defendant has identified the three correction officers, whose identities were sought by plaintiffs as described in their letter (ECF No. 41) as Correction Officers Elias Philogene, Christopher Young, and Taj Moore. Defendant has provided this information and their service addresses to plaintiff.

Thank you for your consideration of the instant application.

Respectfully submitted,

/s/ John Schemitsch  
John Schemitsch

To: **VIA ECF**  
Sara J. Wolkenstorfer  
*Attorney for Plaintiffs*